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Attorneys for Plaintiff Marzen Media LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARZEN MEDIA LLC, a Nevada limited
liability company,

Plaintiff,

v.

FL NEWSLETTER LLC, a Delaware
limited liability company, doing business as
FANTASY LIFE,

Defendant.

CASE NO.: 2:24-cv-01883

**MOTION FOR EXTENSION OF TIME
TO FILE VERIFIED PETITION AND
DESIGNATION OF LOCAL COUNSEL**

(FIRST REQUEST)

Plaintiff Marzen Media LLC (“**Marzen Media**”), by and through its counsel of record, the law firm of Brownstein Hyatt Farber Schreck, LLP, hereby brings this Motion for Extension of Time to File Verified Petition and Designation of Local Counsel (the “Motion”), pursuant to LR IA 11-12, based on the following:

1. On October 8, 2024, Plaintiff Marzen Media (“Plaintiff”) filed its Complaint in this Court against Defendant. *See generally* ECF No. 1.

2. On October 9, 2024, the Court issued a Notice to Counsel Pursuant to Local Rule IA 11-2 for Airina L. Rodrigues to comply with completion and filing of the Verified Petition and

Designation of Local Counsel. *See generally* ECF No. 5.

3. Plaintiff's deadline to comply was October 23, 2024. *See generally* ECF No. 5.

4. This Court may extend the deadline to comply, even after a deadline has passed, for good cause and excusable neglect. *See* FRCP 6(b)(1)(B).

5. There is good cause and excusable neglect to grant an extension of fourteen (14) days' time to comply for the following reasons:

a. Petitioner for pro hoc vice, Airina L. Rodrigues, Esq., is licensed in both Colorado and New York, so her application to this Court requires the production of multiple certificates of good standing. Contacting multiple state bars to secure the certificates of good standing and waiting on their responses has delayed Petitioner's ability to complete her application. *See Exhibit 1* (Declaration of Jamie P. Leavitt, Esq.)

b. Petitioner has also been in depositions and traveling for other cases over the last two weeks, and thus not immediately reachable, which has protracted the relay of the information necessary to complete the Verified Petition. *See id.*

6. Plaintiffs do anticipate additional time will be needed to receive all certificates of good standing from the various jurisdictions. *Id.*

7. To date, Plaintiff's counsel has not yet served the Complaint on Defendants. *See id.*

8. This is the first request for an extension of time to comply to the Court's notice.

9. Plaintiffs make the instant Motion in good faith and without any intent to delay these proceedings.

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1 For the foregoing reasons, Plaintiff requests this Court grant its Motion and permit a 14-day
2 extension of time for Plaintiffs to comply with the Court's notice to file the Verified Petition and
3 Designation of Local Counsel, through and including November 6, 2024.

4 DATED this 24th day of October, 2024.

5 **BROWNSTEIN HYATT FARBER SCHRECK, LLP**

6 By: /s/ Jamie P. Leavitt

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15 *Attorneys for Plaintiff Marzen Media LLC*

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17 IT IS SO ORDERED.

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19 ELAYNA J. YOUCHAH
20 U.S. MAGISTRATE JUDGE

21 Date: October 28, 2024